

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

UNITED STATES, *et al.*,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

No: 1:23-cv-00108-LMB-JFA

**DECLARATION OF ABHISHEK SHRIVASTAVA IN SUPPORT OF
NON-PARTY LINKEDIN CORPORATION'S MOTION TO REDACT**

I, Abhishek Shrivastava, declare as follows:

1. I am a Vice President of Product Management at LinkedIn Corporation (“LinkedIn”). I am familiar with LinkedIn’s business practices, including what LinkedIn considers confidential and does not disclose to the public. I have personal knowledge of the facts described below and make this Declaration in support of LinkedIn’s Motion to Redact pursuant to Local Rule 5(C).

2. **DTX 2221** is an internal LinkedIn financial spreadsheet that contains highly sensitive information concerning LinkedIn’s revenue derived from advertising tools from 2020 to 2023. *See* ECF No. 894, at 143. Specifically, the document contains detailed information about LinkedIn’s advertisers, impressions, clicks, and daily gross and net revenue. LinkedIn does not publicly disclose this type of information because it is proprietary, confidential, and competitively sensitive. LinkedIn further takes great care to protect this competitively sensitive information, which is highly restricted internally within LinkedIn. If this information were publicly disclosed, it would cause competitive harm to LinkedIn by providing its competitors with access to

competitively sensitive information that could be exploited in head-to-head competition with LinkedIn.

3. **DTX 1991** is a chart contained in Google's expert report for Mark Israel. *Id.* at 131.

The chart discloses LinkedIn's revenue derived from DTX 2221 including references to LinkedIn "spending" numbers. LinkedIn does not publicly disclose this highly sensitive information. If disclosed, this information could be used by LinkedIn's competitors to obtain LinkedIn's advertising revenue, replicate LinkedIn's advertising strategies, and cause competitive harm.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on: July 25, 2024

DocuSigned by:

F058805DEF794BB

Abhishek Shrivastava